

COPY

Before the
Federal Communications Commission
Washington, DC 20554

RECEIVED

APR 13 2005

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Inland Cellular Telephone Company) CC Docket 96-45
)
Petition for Waiver of Section 54.314(d))
of the Commission's Rules)
)
)
)

RECEIVED - FCC

MAR 30 2005

Federal Communication Commission
Bureau / Office

To: Chief, Wireline Competition Bureau

PETITION FOR WAIVER

Pursuant to Section 1.925 of the Commission's Rules, 47 C.F.R. § 1.925, Inland Cellular Telephone Company, general partner of Eastern Sub-RSA Limited Partnership ("ESRLP") and of Washington RSA No. 8 Limited Partnership ("WA8LP") (collectively, "Inland Cellular"), by its counsel, respectfully requests a waiver of Section 54.314(d) of the Commission's Rules, 47 C.F.R. § 54.314(d). Specifically, Inland Cellular requests that the Commission waive the October 1, 2003 deadline for annual state certifications for rural eligible telecommunications carriers ("ETC") in order to permit Inland Cellular to receive universal service support for the first, second, third and fourth quarters of 2004.

I. BACKGROUND

ESRLP and WA8LP are small cellular carriers operating in rural portions of Washington State. ESRLP is the Block B2 cellular licensee in the Washington 5 – Kittitas RSA (call sign KNKQ283). WA8LP is the Block B cellular licensee in the Washington 8 – Whitman RSA (call sign KNKN489), as well as a Block B licensee in the Idaho 1B2 – Boundary RSA (call sign KNKQ400), and the Idaho 2B2 – Idaho RSA (call sign KNKR305). On August 30, 2002, the

Washington Utilities and Transportation Commission ("WUTC") issued an Order in Docket No. UT-023040 designating ESRLP and WA8LP as ETCs.¹ From that date forward, these carriers became eligible to receive universal service fund support.

The principle underlying the universal service fund is to ensure that consumers in all regions of the country, including those in low income, rural, insular and high cost areas receive telephone service comparable to that received in the urban areas of the nation.² Pursuant to Section 54.314 of the Commission's Rules, if a state desires ETCs, such as ESRLP and WA8LP, operating within the state's jurisdiction to receive universal service support, the WUTC must file an annual certification with the Universal Service Administrative Company ("USAC") and with the Commission "stating that all federal high-cost support provided to such carriers within that state will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."³

To assist it in its compliance with the Commission's rules, the WUTC has mandated that each ETC receiving high-cost universal service fund support in Washington State provide the WUTC with a similar certification each year, not later than August 31st ("WA State Certification").⁴

Inland Cellular filed the annual WA State Certifications with the WUTC on August 15, 2003.⁵ Subsequently, on September 3, 2003, the WUTC provided the Commission with the

¹ See Order Granting Inland Cellular Telephone Company, d/b/a Inland Cellular, Eastern Sub-RSA Limited Partnership and Washington RSA No. 8 Limited Partnership Petition for Designation as an Eligible Telecommunications Carrier, Docket No. UT-023040, Washington Utilities and Transportation Commission (2002).

² 47 U.S.C. 254(b)(3).

³ 47 C.F.R. § 54.314(a).

⁴ See Order Requiring Filing by Eligible Telecommunications Carriers Receiving Federal High Cost Support, Docket No. UT-013047, Washington Utilities and Transportation Commission (2001).

⁵ See Exhibit 1 attached, two Letters and two Affidavits, on behalf of ESRLP and WA8LP, from John P. Coonan, Treasurer, Inland Cellular, to Carole J. Washburn, Executive Secretary, Washington Utilities and Transportation Commission (dated August 15, 2003).

annual rural carriers state certification for Washington State, as required by Section 54.314(d), purporting to include all ETCs that were qualified to receive universal support for all four quarters of 2004.⁶ Due to an apparent administrative error, the WUTC omitted Inland Cellular from the list of carriers found in its September 3rd letter. When Inland Cellular discovered the omission, it contacted the WUTC and requested a correction. On October 27, 2004, the WUTC rectified this oversight and corrected its ETC certification to include Inland Cellular.⁷ Unfortunately, this clarification came well after the October 1st deadline specified in Section 54.314(d)(1). In addition, since the ETC Correction Letter was filed after July, 2004 Inland Cellular did not receive universal service support beginning in July 2004.⁸ Inland Cellular, however, continued to offer universal service in its designated areas throughout 2004. Accordingly, Inland Cellular seeks a waiver of the October 1, 2003 certification deadline in order to allow it retroactively to receive support for all of 2004.⁹

II. A WAIVER IS WARRANTED

The Commission may waive its rules for “good cause” shown, if “in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable

⁶ See Exhibit 2 attached, Letter from Carole J. Washburn, Executive Secretary, Washington Utilities and Transportation Commission, to Marlene H. Dortch, Office of the Secretary, Federal Communications Commission (dated September 3, 2003) (“2003 WUTC State Certification”).

⁷ See Exhibit 3 attached, Letter from Carole J. Washburn, Executive Secretary, Washington Utilities and Transportation Commission, to Marlene H. Dortch, Office of the Secretary, Federal Communications Commission and to Irene Flannery, Universal Service Administrative Company (dated October 27, 2004) (“ETC Correction Letter”). After Inland Cellular received the ETC Correction Letter, it also contacted USAC and provided a copy of the letter to USAC. Inland Cellular erroneously believed, at that time, that no further action was necessary.

⁸ Section 54.314(d)(5) provides that where certifications are filed after July 1 carriers shall not receive support in that year.

⁹ As Exhibits 4 and 5 reflect, USAC withheld funding for certain of the high-cost support programs, but continued to disburse them for others. In some cases, USAC continued making disbursements for some programs but then reversed the disbursements later. For example, in October 2004, USAC reversed WA8LP’s disbursement for Local Switching Support (“LSS”) payments for January 2004 through September 2004 in the amount of \$102,970, which exceeded, by \$70,508, WA8LP’s total high-cost funding enumerated on the October invoice. USAC therefore billed WA8LP, and WA8LP paid, the difference of \$70,508.

alternative.”¹⁰ As discussed below, the omission which led to the late-filed corrected state certification was entirely beyond the control of Inland Cellular. Inland Cellular fulfilled its obligations and provided the documentation requested by the WUTC in a timely fashion, and it should not be denied vital support due to the State’s inadvertent ministerial error. The WUTC expressly concurs with Inland Cellular’s position. In a letter dated March 9, 2005 (attached as Exhibit 6), WUTC states that it “wishes to notify the Commission that it supports Inland Cellular’s request for a waiver in this matter and point[s] out that Inland Cellular timely provided all requested certification material to the WUTC for the 2004 funding year and thus is eligible to receive support funds from USAC for 2004.”¹¹ In addition, good cause exists for the Commission to allow Inland Cellular to receive its universal service fund support for 2004.

A. Special Circumstances Warrant Relief

The Commission has previously indicated that one rationale behind the annual state certifications, in addition to the preeminent objective of ensuring that carriers are using their funding for appropriate purposes, is to allow USAC sufficient time to adequately process the certifications before it is required to submit its support estimates to the Commission for the year.¹² This laudable goal notwithstanding, the Commission has waived the annual filing requirement where the burden of non-receipt of universal service funds greatly outweighs any management difficulties that USAC might experience in processing late-filed certifications and allocating such funds.¹³

¹⁰ 47 C.F.R. §§ 1.3, 1.925; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) *cert. denied*, 409 U.S. 1027 (1972).

¹¹ Letter from Carole J. Washburn, Executive Secretary, Washington Utilities and Transportation Commission, to Marlene H. Dortch, Office of the Secretary, Federal Communications Commission (dated March 9, 2005).

¹² See e.g., *Federal-State Joint Board on Universal Service, RFB Cellular, Inc. Petition for Waiver of Sections 54.314(d) and 54.307(c) of the Commission’s Rules and Regulations*, Order, 17 FCC Rcd 24387, 24390 (2002) (“*RFB Cellular Order*”).

¹³ *Id.*

The FCC has, when appropriate, granted ETCs relief similar to that requested herein by Inland Cellular. In *Federal-State Joint Board on Universal Service, West Virginia Public Service Commission Request for Waiver of State Certification Requirements for High-Cost Universal Service Support for Non-Rural Carriers*, Order, 16 FCC Rcd 5784 (2001) (“*West Virginia PSC Order*”), the Commission granted a waiver of the Section 54.313 annual state certification requirement after the West Virginia Public Service Commission (“PSC”) inadvertently failed to timely file its state certification jeopardizing Verizon West Virginia’s receipt of funding for the first quarter of 2001. In that case, the Commission found that a waiver was justified because strict adherence to the rules would cause potential harm to West Virginia customers of non-rural carriers.¹⁴ The Commission declared egregious “the potential harm caused by loss of one quarter of annual federal high-cost support....”¹⁵

The facts arising from Inland Cellular’s request for a waiver, in fact, present more exigent circumstances, as Inland Cellular is a small Tier III carrier serving the public in rural portions of Washington State. Moreover, Inland Cellular would be forced to forfeit not just one quarter of universal service fund support, but four quarters of such support. Inland Cellular cannot be expected to fulfill its duties as an ETC without the receipt of appropriate funding. As the Commission recognized in the *West Virginia PSC Order*, the potential harm ultimately falls on the customers in these markets who feel the effects of lack of funding for facilities and services.

Furthermore, the Commission has routinely waived Section 54.314(d) to allow carriers who received their ETC designation after the October 1st certification cut-off date to receive universal service support from the date of their ETC designation to avoid onerous and unfair

¹⁴ *Id.* at 5786.

¹⁵ *Id.*

results to these carriers.¹⁶ These cases demonstrate that, in unique cases, the Commission places a higher priority on a carrier's ability to receive the support to which they are entitled than on strict adherence to the administrative deadline. If a waiver of Section 54.314(d) is justified in those cases, it is surely warranted in this instance where Inland Cellular timely complied with all its obligations and filing requirements to the WUTC, but was left off of that state's annual certification due to an inadvertent administrative oversight that was subsequently corrected.

A draconian application of Section 54.314(d), whereby Inland Cellular is denied support for 2004, does not serve the underlying purpose of preventing misuse of support, because Inland Cellular has already provided: a) the WUTC with adequate assurances in its 2003 WA State Certification that its support would be used for the appropriate and intended purposes; and b) universal service to its customers in 2004. As described by WUTC in its March 9, 2005 letter in support of Inland's instant request for waiver, ESRLP and WA8LP timely met the WUTC's pre-certification requirements; and it was an administrative error by the WUTC (not ESRLP and WA8LP) that resulted in the USAC's denial of support funds in 2004.¹⁷ Thus, Inland Cellular respectfully suggests that, on an equitable basis, grant of the waiver is warranted.

B. Waiver of the Certification Requirement would be in the Public Interest

A grant of the instant waiver would be in the public interest, because, as the Commission has stressed in the past, competitively neutral allocation of universal service funds "is critical to

¹⁶ See e.g., *M&L Enterprises, Inc., d/b/a Skyline Telephone Company, Waiver of Sections 54.301(b), 54.314(d) and 54.903(a) of the Commission's Rules*, Order, DA 05-84 (released January 14, 2005); *Federal-State Joint Board on Universal Service, Grande Communications, Inc., Petition for Waiver of Sections 54.307 and 54.314 of the Commission's Rules and Regulations*, Order, 19 FCC Rcd 15580 (2004) ("Grande Communications Order"); *Federal-State Joint Board on Universal Service, Midwest Wireless Iowa, L.L.C., Petition for Waiver of Sections 54.313(d) and 54.314(d) of the Commission's Rules and Regulations*, Order, 19 FCC Rcd 10484 (2004); *Federal-State Joint Board on Universal Service, N.E. Colorado Cellular, Inc., Petition for Waiver of Section 54.314(d) of the Commission's Rules and Regulations*, Order, 18 FCC Rcd 15597 (2003); *RFB Cellular Order*, 17 FCC Rcd 24387.

¹⁷ See Exhibit 6.

ensuring that all Americans have access to affordable telecommunications.”¹⁸ Support funds are an essential resource to small, rural, Tier III carriers, which have limited funding sources to maintain and upgrade their networks. Receipt of support for 2004 will allow Inland Cellular to build-out, update and enhance its cellular networks in Washington State and ensure that customers living in the rural areas of Washington State will, on an on-going basis, receive affordable telecommunications services. Conversely, the continued denial of the 2004 funding would constitute a significant financial setback for Inland Cellular resulting in future network upgrades being delayed or eliminated.

¹⁸ *Grande Communications Order*, 19 FCC Rcd at 15584, ¶ 10 (citing, *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, CC Docket 96-45, 14 FCC Rcd 20432, ¶¶ 89-90 (1999), *reversed in part and remanded in part*, *Qwest Corp., v. FCC*, 258 F.3d 1191 (10th Cir. 2001).

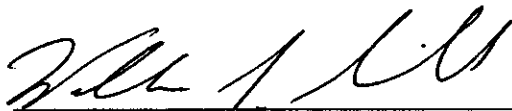
III. CONCLUSION

For the foregoing reasons, Inland Cellular respectfully requests a waiver of the 2003 certification deadline to allow payment in full of universal service support to Inland Cellular for all four quarters of 2004. A declaration from John P. Coonan, Treasurer of Inland Cellular Telephone Company, is attached.

Respectfully submitted,

INLAND CELLULAR TELEPHONE COMPANY

By:



William J. Sill

L. Charles Keller

Catherine Fox

Wilkinson Barker Knauer, LLP

2300 N Street, N.W., Suite 700

Washington, D.C. 20037-1128

202-783-4141

Its Attorneys

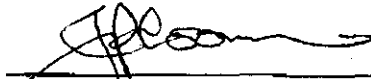
March 30, 2005

DECLARATION OF JOHN P. COONAN

I, John P. Coonan, Treasurer of Inland Cellular Telephone Company, hereby declare the following:

1. I have reviewed the attached Petition for Waiver.
2. The factual assertions made therein are true and correct to the best of my knowledge and belief and are submitted in good faith.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.



John P. Coonan
Treasurer
Inland Cellular Telephone Company,
General Partner of Eastern Sub-RSA Limited Partnership
and Washington RSA No. 8 Limited Partnership

March 28, 2005

Exhibit 1

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



August 15, 2003

Via Federal Express overnight delivery

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250
(360) 664-1174

Re: **Docket No. UT-013047**

Dear Ms. Washburn:

Pursuant to the requirements contained in the Commission's Order entered in Docket No. UT-013047, Inland Cellular Telephone Company, as general partner for Eastern Sub-RSA Limited Partnership (*dba* Inland Cellular) hereby submits the Affidavit concerning the offering of services and the use of funds under 47 C.F.R. §54.314. The purpose of this filing is to allow the Washington Utilities and Transportation Commission to certify to the Federal Communications Commission and the Universal Service Administrative Company that Eastern Sub-RSA Limited Partnership (*dba* Inland Cellular) qualifies for continued receipt of federal support during 2004.

If there are any questions concerning the foregoing, please contact me at (509) 649-2211.

Sincerely,

A handwritten signature in black ink, appearing to read "JPC", with a long, horizontal, wavy line extending to the right.

John P. Coonan
Treasurer

Enclosure

cc: Betty Erdahl (WUTC Staff)
Rick Finnigan

**AFFIDAVIT CERTIFYING USE OF
UNIVERSAL SERVICE FUNDS**

I, John P. Coonan, being of lawful age and duly sworn, on my oath state that I am Treasurer of Inland Cellular Telephone Company, the general partner for Eastern Sub-RSA Limited Partnership (dba Inland Cellular) ("Company"), that I am authorized to execute this affidavit on behalf of the Company, and that the facts set forth in this affidavit are true to the best of my knowledge, information and belief. I hereby certify to the Washington Utilities and Transportation Commission ("Commission"), for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. § 54.314, as follows:

(1) that during the calendar year 2002, the Company provided the supported services required by 47 U.S.C. § 214(e) as described and modified in the Commission Order granting the Company Eligible Telecommunications Carrier ("ETC") status;

(2) that during the 2002 calendar year, the Company advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e) and as described in the Commission Order granting the Company ETC status;

(3) that the Company is eligible to receive federal high-cost universal service support from the sources described in 47 C.F.R. § 54.314;

(4) that funds from the sources described in 47 C.F.R. § 54.314 received by the Company will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended;

(5) that the amount of federal high-cost universal service fund support received by the Company for calendar year 2002 was \$0; and

(6) the loop counts on which federal high-cost universal service support received by the Company for the calendar year 2002 was based were as follows: for the first quarter of calendar year 2002, 0; for the second quarter of calendar year 2002, 0; for the third quarter of calendar year 2002, 0; and for the fourth quarter of calendar year 2002, 0. Since Inland Cellular did not receive universal service fund support in 2002, there are no associated loops.

DATED this 15th day of August, 2003.

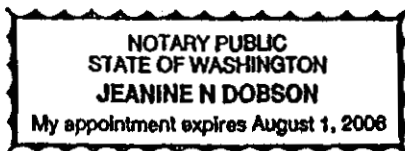
INLAND CELLULAR TELEPHONE COMPANY
(GENERAL PARTNER OF EASTERN SUB-RSA LIMITED
PARTNERSHIP (DBA INLAND CELLULAR))

By:

John P. Coonan

Its: Treasurer

SUBSCRIBED AND SWORN to before me this 15th day of August, 2003.



Jeanine N. Dobson
Notary Public in and for the
State of Washington, residing at
Boston
My commission expires: August 1, 2006

From: JAMES K. BROOKS (509)649-2500
INLAND CELLULAR
103 S. SECOND STREET
ROSLYN, WA, 98941

REVENUE BARCODE



FedEx.

To: Ms. Carole J. Washburn (360)664-1174
WA Utilities & Transportation Comm
1300 S. Evergreen Park Drive SW

SHIP DATE: 19AUG03
WEIGHT: 1 LB8

Olympia, WA, 985047250

Ref: Docket # UT-013047 - WAS



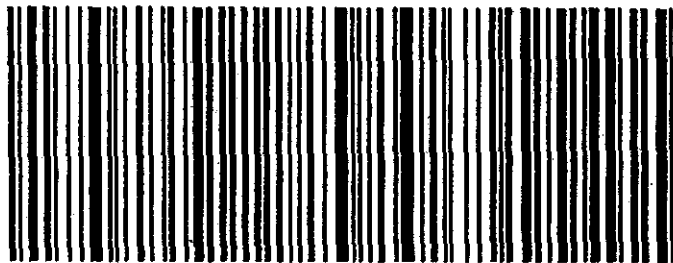
DELIVERY ADDRESS BARCODE (FEDEX-EDI)

TRK # 7903 8376 3543 6281

FedEx PRIORITY OVERNIGHT

WED
AADeliver by:
20AUG03

98504-WA-US

SEA
XH OLMA

Shipping Label: Your shipment is complete

[Cancel shipment](#) [Edit shipment information](#) [Process another shipment](#)[Go to next step](#)

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300



August 15, 2003

Via Federal Express overnight delivery

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250
(360) 664-1174

Re: **Docket No. UT-013047**

Dear Ms. Washburn:

Pursuant to the requirements contained in the Commission's Order entered in Docket No. UT-013047, Inland Cellular Telephone Company, as general partner for Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular) hereby submits the Affidavit concerning the offering of services and the use of funds under 47 C.F.R. §54.314. The purpose of this filing is to allow the Washington Utilities and Transportation Commission to certify to the Federal Communications Commission and the Universal Service Administrative Company that Washington RSA No. 8 Limited Partnership (*dba* Inland Cellular) qualifies for continued receipt of federal support during 2004.

If there are any questions concerning the foregoing, please contact me at (509) 649-2211.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Coonan", written over a horizontal line.

John P. Coonan
Treasurer

Enclosure

cc: Betty Erdahl (WUTC Staff)
Rick Finnigan

**AFFIDAVIT CERTIFYING USE OF
UNIVERSAL SERVICE FUNDS**

I, John P. Coonan, being of lawful age and duly sworn, on my oath state that I am Treasurer of Inland Cellular Telephone Company, the general partner for Washington RSA No. 8 Limited Partnership (dba Inland Cellular) ("Company"), that I am authorized to execute this affidavit on behalf of the Company, and that the facts set forth in this affidavit are true to the best of my knowledge, information and belief. I hereby certify to the Washington Utilities and Transportation Commission ("Commission"), for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. § 54.314, as follows:

(1) that during the calendar year 2002, the Company provided the supported services required by 47 U.S.C. § 214(e) as described and modified in the Commission Order granting the Company Eligible Telecommunications Carrier ("ETC") status;

(2) that during the 2002 calendar year, the Company advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e) and as described in the Commission Order granting the Company ETC status;

(3) that the Company is eligible to receive federal high-cost universal service support from the sources described in 47 C.F.R. § 54.314;

(4) that funds from the sources described in 47 C.F.R. § 54.314 received by the Company will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended;

(5) that the amount of federal high-cost universal service fund support received by the Company for calendar year 2002 was \$0; and

(6) the loop counts on which federal high-cost universal service support received by the Company for the calendar year 2002 was based were as follows: for the first quarter of calendar year 2002, 0; for the second quarter of calendar year 2002, 0; for the third quarter of calendar year 2002, 0; and for the fourth quarter of calendar year 2002, 0. Since Inland Cellular did not receive universal service fund support in 2002, there are no associated loops.

DATED this 15th day of August, 2003.

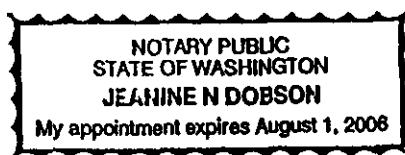
INLAND CELLULAR TELEPHONE COMPANY
(GENERAL PARTNER OF WASHINGTON RSA NO. 8 LIMITED
PARTNERSHIP (DBA INLAND CELLULAR))

By:

John P. Coonan

Its: Treasurer

SUBSCRIBED AND SWORN to before me this 15th day of August, 2003.



Jeanine N. Dobson
Notary Public in and for the
State of Washington, residing at
Boslyn
My commission expires: August 1, 2006

From: JAMES K. BROOKS (509)649-2500
INLAND CELLULAR
103 S. SECOND STREET
ROSLYN, WA, 98941

REVENUE BARCODE



FedEx.

To: Ms. Carole J. Washburn (360)664-1174
WA Utilities & Transportation Comm
1300 S. Evergreen Park Drive SW

SHIP DATE: 19AUG03
WEIGHT: 1 LBS

Olympia, WA, 985047250

Ref: Docket # UT-013047 - WA8



DELIVERY ADDRESS BARCODE (FEDEX-EDR)

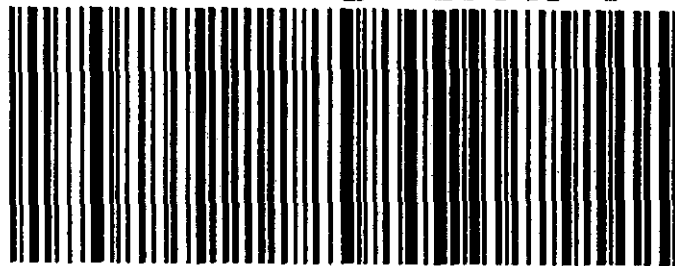
TRK # 7903 8377 5536 6281

FedEx PRIORITY OVERNIGHT

SEA

98504-WA-US

XH OLMA

WED
AADeliver by:
20AUG03

Shipping Label: Your shipment is complete

[Cancel shipment](#) [Edit shipment information](#) [Process another shipment](#)[Go to next step](#)

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

Exhibit 2

RECEIVED
RECORDS MANAGEMENT

03 SEP -3 PM 4:20

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Docket UT-031103

September 3, 2003

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Irene Flannery
Vice President - High Cost & Low Income Division
Universal Service Administrative Company
2120 L. Street, NW-Suite 600
Washington, DC 20037

Re: CC Docket 96-45, USF Certification as Required by 47 C.F.R. § 54.314

Ms. Dortch and Ms. Flannery:

Pursuant to 47 C.F.R. § 54.314 and on the basis described below, the Washington Utilities and Transportation Commission (WUTC) has received letters from rural incumbent local exchange carriers and/or eligible telecommunications carriers (listed below) certifying that federal high-cost support funds will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The WUTC certifies compliance with 47 C.F.R. 54.314(a) based entirely on the corporate officer certifications. The following is a list of all carriers who sent certifications to the WUTC and includes all carriers in Washington state currently receiving federal universal service support:

522404 Asotin Telephone Company
522410 CenturyTel of Cowiche, Inc.
522408 CenturyTel of Inter Island, Inc.
522408 CenturyTel of Washington, Inc.
522412 Ellensburg Telephone Company
522416 Verizon Northwest Inc. - WA
522417 Hat Island Telephone Company
522419 Hood Canal Communications, Inc.
522423 Inland Telephone Company
522426 Kalama Telephone Company
522427 Lewis River Telephone Company
522431 Mashell Telecom, Inc.
522430 McDaniel Telephone Company
522418 Pend Orcille Telephone Company

Posted rms ✓

Letter to Marlene H. Dortch and Irene Flannery

Page 2

September 3, 2003

522437 Pioneer Telephone Company
529002 RCC Minnesota, Inc;
522442 St. John Telephone Company
522446 Tenino Telephone Company
522447 The Toledo Telephone Co., Inc.
529001 United States Cellular Corporation
522400 United Telephone Company of the Northwest DBA Sprint
522416 Verizon Northwest Inc - WA (Contel)
522451 Western Wahkiakum County Telephone Company
522452 Whidbey Telephone Company
522453 YCOM Networks, Inc.

If you have any questions regarding this letter, please contact Betty Erdahl at berdahl@wutc.wa.gov or at (360) 664-1283.

Sincerely,

Carole J. Washburn
Executive Secretary

Exhibit 3



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

October 27, 2004

Docket No. UT-031103

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445-112 12th Street, SW
Washington, DC 20554

Irene Flannery
Universal Service Administrative
Company
2000 L. Street, NW
Washington, DC 20037

Re: CC Docket 96-45, USF Certification as Required by 47 C.F.R. § 54.314

- CORRECTION to 2003 Certification

Ms. Dortch and Ms. Flannery:

The Washington Utilities and Transportation Commission (WUTC) hereby corrects its ETC certification for 2003 in which the WUTC failed to certify Inland Cellular Telephone Company (Easter Sub-RSA Limited Partnership, and Washington RSA No. 8 Limited Partnership).

Inland Cellular's affidavit, received August 21, 2003, is attached. Attached also is the WUTC's 2003 certification letter.

Pursuant to 47 C.F.R. § 54.314 and on the basis described below, the Washington Utilities and Transportation Commission (WUTC) has received certification from Inland Cellular Telephone Company certifying that federal high-cost support funds will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The WUTC certifies compliance with 47 C.F.R. 54.314(a) based entirely on the corporate officer certification.

Marlene H. Dortch and Irene Flannery

October 27, 2004

Page 2

If you have any questions regarding this letter, please contact Robert Shirley at bshirley@wutc.wa.gov or at (360) 664-1292.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carole J. Washburn".

Carole J. Washburn
Executive Secretary

Attachments

INLAND CELLULAR TELEPHONE COMPANY
Corporate Offices

103 S. 2nd St.
P.O. Box 688
Roslyn, WA 98941
Telephone: (509) 649-2500
Fax: (509) 649-3300

RECEIVED INLAND
RECORDS MANAGEMENT CELLULAR

03 AUG 21 AM 9:31

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

August 15, 2003

Via Federal Express overnight delivery

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250
(360) 664-1174

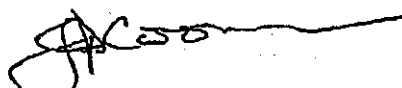
Re: Docket No. UT-013047

Dear Ms. Washburn:

Pursuant to the requirements contained in the Commission's Order entered in Docket No. UT-013047, Inland Cellular Telephone Company, as general partner for Washington RSA No. 8 Limited Partnership (dba Inland Cellular) hereby submits the Affidavit concerning the offering of services and the use of funds under 47 C.F.R. §54.314. The purpose of this filing is to allow the Washington Utilities and Transportation Commission to certify to the Federal Communications Commission and the Universal Service Administrative Company that Washington RSA No. 8 Limited Partnership (dba Inland Cellular) qualifies for continued receipt of federal support during 2004.

If there are any questions concerning the foregoing, please contact me at (509) 649-2211.

Sincerely,


John P. Coonan
Treasurer

Enclosure

cc: Betty Erdahl (WUTC Staff)
Rick Finnigan

**AFFIDAVIT CERTIFYING USE OF
UNIVERSAL SERVICE FUNDS**

I, John P. Coonan, being of lawful age and duly sworn, on my oath state that I am Treasurer of Inland Cellular Telephone Company, the general partner for Washington RSA No. 8 Limited Partnership (dba Inland Cellular) ("Company"), that I am authorized to execute this affidavit on behalf of the Company, and that the facts set forth in this affidavit are true to the best of my knowledge, information and belief. I hereby certify to the Washington Utilities and Transportation Commission ("Commission"), for use by the Commission in providing the certification to the Federal Communications Commission and Universal Service Administrative Company required by 47 C.F.R. § 54.314, as follows:

(1) that during the calendar year 2002, the Company provided the supported services required by 47 U.S.C. § 214(e) as described and modified in the Commission Order granting the Company Eligible Telecommunications Carrier ("ETC") status;

(2) that during the 2002 calendar year, the Company advertised the availability of supported services and the charges for them as required by 47 U.S.C. § 214(e) and as described in the Commission Order granting the Company ETC status;

(3) that the Company is eligible to receive federal high-cost universal service support from the sources described in 47 C.F.R. § 54.314;

(4) that funds from the sources described in 47 C.F.R. § 54.314 received by the Company will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended;

(5) that the amount of federal high-cost universal service fund support received by the Company for calendar year 2002 was \$0; and

(6) the loop counts on which federal high-cost universal service support received by the Company for the calendar year 2002 was based were as follows: for the first quarter of calendar year 2002, 0; for the second quarter of calendar year 2002, 0; for the third quarter of calendar year 2002, 0; and for the fourth quarter of calendar year 2002, 0. Since Inland Cellular did not receive universal service fund support in 2002, there are no associated loops.

DATED this 15th day of August, 2003.

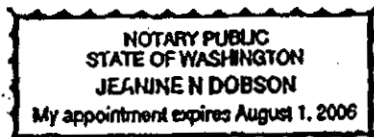
INLAND CELLULAR TELEPHONE COMPANY
(GENERAL PARTNER OF WASHINGTON RSA NO. 8 LIMITED
PARTNERSHIP (DBA INLAND CELLULAR))

By:

John P. Coonan

Its: Treasurer

SUBSCRIBED AND SWORN to before me this 15th day of August, 2003.



Jeanine N. Dobson
Notary Public in and for the
State of Washington, residing at
Boslyn
My commission expires: August 1, 2006

RECEIVED
RECORDS MANAGEMENT

03 SEP -3 PM 4:20

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Docket UT-031103

September 3, 2003

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Irene Flannery
Vice President - High Cost & Low Income Division
Universal Service Administrative Company
2120 L. Street, NW-Suite 600
Washington, DC 20037

Re: CC Docket 96-45, USF Certification as Required by 47 C.F.R. § 54.314

Ms. Dortch and Ms. Flannery:

Pursuant to 47 C.F.R. § 54.314 and on the basis described below, the Washington Utilities and Transportation Commission (WUTC) has received letters from rural incumbent local exchange carriers and/or eligible telecommunications carriers (listed below) certifying that federal high-cost support funds will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. The WUTC certifies compliance with 47 C.F.R. 54.314(a) based entirely on the corporate officer certifications. The following is a list of all carriers who sent certifications to the WUTC and includes all carriers in Washington state currently receiving federal universal service support:

522404 Asotin Telephone Company
522410 CenturyTel of Cowiche, Inc.
522408 CenturyTel of Inter Island, Inc.
522408 CenturyTel of Washington, Inc.
522412 Ellensburg Telephone Company
522416 Verizon Northwest Inc. - WA
522417 Hat Island Telephone Company
522419 Hood Canal Communications, Inc.
522423 Inland Telephone Company
522426 Kalama Telephone Company
522427 Lewis River Telephone Company
522431 Mashell Telecom, Inc.
522430 McDaniel Telephone Company
522418 Pend Oreille Telephone Company

Posted rms ✓

Letter to Marlene H. Dortch and Irene Flannery

Page 2

September 3, 2003

522437 Pioneer Telephone Company
529002 RCC Minnesota, Inc;
522442 St. John Telephone Company
522446 Tenino Telephone Company
522447 The Toledo Telephone Co., Inc.
529001 United States Cellular Corporation
522400 United Telephone Company of the Northwest DBA Sprint
522416 Verizon-Northwest Inc - WA (Contel)
522451 Western Wahkiakum County Telephone Company
522452 Whidbey Telephone Company
522453 YCOM Networks, Inc.

If you have any questions regarding this letter, please contact Betty Erdahl at berdahl@wutc.wa.gov or at (360) 664-1283.

Sincerely,

Carole J. Washburn
Executive Secretary

Exhibit 4

INLAND CELLULAR - WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
SUMMARY OF UNIVERSAL SERVICE DISBURSEMENTS - HIGH COST STATEMENTS
FOR THE YEAR ENDED DECEMBER 31, 2004

	TOTAL	INTERSTATE ACCESS SUPPORT	ICLS	HIGH COST LOOP	LONG TERM SUPPORT	LOCAL SWITCHING SUPPORT
<u>BOOKED AMOUNTS</u>						
<u>FIRST QUARTER</u>						
JAN	\$ 51,111	\$ 3,382	\$ 14,946		\$ 16,015	\$ 16,768
FEB	\$ 51,074	\$ 3,313	\$ 14,946		\$ 16,047	\$ 16,768
MAR	\$ 51,638	\$ 3,313	\$ 14,952	\$ 204	\$ 16,248	\$ 16,921
TOTAL FIRST QUARTER	\$ 153,823	\$ 10,008	\$ 44,844	\$ 204	\$ 48,310	\$ 50,457
<u>SECOND QUARTER</u>						
APR	\$ 55,185	\$ 3,603	\$ 16,592		\$ 17,436	\$ 17,554
MAY	\$ 54,893	\$ 3,342	\$ 16,592		\$ 17,403	\$ 17,556
JUN	\$ 54,893	\$ 3,342	\$ 16,592		\$ 17,403	\$ 17,556
TOTAL SECOND QUARTER	\$ 164,971	\$ 10,287	\$ 49,776	\$ -	\$ 52,242	\$ 52,666
<u>THIRD QUARTER</u>						
JUL	\$ 31,793	\$ 2,793	\$ 29,000			
AUG	\$ 31,913	\$ 2,913	\$ 29,000			
SEP	\$ 31,913	\$ 2,913	\$ 29,000			
TOTAL THIRD QUARTER	\$ 95,619	\$ 8,619	\$ 87,000	\$ -	\$ -	\$ -
<u>FOURTH QUARTER</u>						
OCT	\$ (70,508)	\$ 2,519	\$ 30,009	\$ (66)		\$ (102,970)
NOV	\$ 32,929	\$ 2,921	\$ 30,009	\$ (1)		
DEC	\$ 32,444	\$ 2,921	\$ 30,009	\$ (486)		
TOTAL FOURTH QUARTER	\$ (5,135)	\$ 8,361	\$ 90,027	\$ (553)	\$ -	\$ (102,970)
YEAR-END TOTAL	\$ 409,278	\$ 37,275	\$ 271,647	\$ (349)	\$ 100,552	\$ 153
SUPPPORT X/IAS	\$ 372,003		\$ 271,647	\$ (349)	\$ 100,552	\$ 153
PROJECTED TO RECEIVE	\$ 1,005,707		\$ 272,842	\$ 421,766	\$ 100,355	\$ 210,745
DIFFERENCE	\$ 633,704		\$ 1,195	\$ 422,115	\$ (197)	\$ 210,592



FEB 7 2005

Universal Service Administrative Company

High Cost Statement

01-31-05

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of December, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,921.00	(\$486.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	\$0.00
Total		\$2,921.00	(\$486.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	\$0.00
Total Disbursement							\$32,444.00	

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



Universal Service Administrative Company

High Cost Statement

12-30-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

JAN 6 2005

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of November, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,921.00	(\$1.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	\$0.00
	Total	\$2,921.00	(\$1.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	\$0.00
	Total Disbursement							\$32,929.00

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



DEC 6 2004

Universal Service Administrative Company

High Cost Statement

11-30-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of October, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,519.00	(\$66.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	\$102,970.00
	Total	\$2,519.00	(\$66.00)	\$0.00	\$30,009.00	\$0.00	\$0.00	(\$102,970.00)
	Total Disbursement							(\$70,508.00)

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department

NOV 1 2004



Universal Service Administrative Company

High Cost Statement
10-29-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of September, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,913.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
Total		\$2,913.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
Total Disbursement								\$31,913.00

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department

OCT 5 2004



Universal Service Administrative Company

High Cost Statement

9-30-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of August, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,913.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
Total		\$2,913.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
Total Disbursement							\$31,913.00	

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



Universal Service Administrative Company

High Cost Statement

8-31-04

Attn: Sandra Cooke

Washington RSA No. 8, LP

P.O. Box 688

Roslyn, WA 98941

SEP 7 2004

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of July, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$2,793.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
	Total	\$2,793.00	\$0.00	\$0.00	\$29,000.00	\$0.00	\$0.00	\$0.00
	Total Disbursement							\$31,793.00

For further clarifications, please direct your inquires to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



AUG 6 2004

Universal Service Administrative Company

High Cost Statement

7-30-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of June, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,342.00	\$0.00	\$0.00	\$16,592.00	\$17,403.00	\$0.00	\$17,556.00
Total		\$3,342.00	\$0.00	\$0.00	\$16,592.00	\$17,403.00	\$0.00	\$17,556.00
Total Disbursement								\$54,893.00

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



Universal Service Administrative Company

High Cost Statement

6-29-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

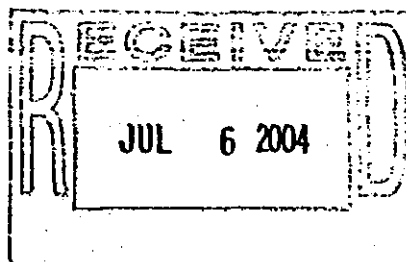
This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of May, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,342.00	\$0.00	\$0.00	\$16,592.00	\$17,403.00	\$0.00	\$17,556.00
Total		\$3,342.00	\$0.00	\$0.00	\$16,592.00	\$17,403.00	\$0.00	\$17,556.00
Total Disbursement								\$54,893.00

For further clarifications, please direct your questions to Customer Service Bureau at 1-888-641-8722.

Sincerely,

USAC Disbursements Department



2000 L Street, N.W. Suite 200 Washington, DC 20036 Phone: (888) 641-8722 Fax: (888) 276-8736

<http://www.universalservice.org>



JUN 8 2004

Universal Service Administrative Company

High Cost Statement

5-28-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of April, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,603.00	\$0.00	\$0.00	\$16,592.00	\$17,436.00	\$0.00	\$17,554.00
Total		\$3,603.00	\$0.00	\$0.00	\$16,592.00	\$17,436.00	\$0.00	\$17,554.00
Total Disbursement								\$55,185.00

For further clarifications, please direct your questions to Customer Service Bureau at 1-888-641-8722.

Sincerely,

USAC Disbursements Department

2000 L Street, N.W. Suite 200 Washington, DC 20036 Phone: (888) 641-8722 Fax: (888) 276-8736

<http://www.universalservice.org>



MAY 7 2004

Universal Service Administrative Company

High Cost Statement

4-29-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of March, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,313.00	\$204.00	\$0.00	\$14,952.00	\$16,248.00	\$0.00	\$16,921.00
Total		\$3,313.00	\$204.00	\$0.00	\$14,952.00	\$16,248.00	\$0.00	\$16,921.00
Total Disbursement								\$51,638.00

For further clarifications, please direct your questions to Customer Service Bureau at 1-888-641-8722.

Sincerely,

USAC Disbursements Department



APR 3 2004

Universal Service Administrative Company

High Cost Statement

03-31-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of February, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,313.00	\$0.00	\$0.00	\$14,946.00	\$16,047.00	\$0.00	\$16,768.00
Total		\$3,313.00	\$0.00	\$0.00	\$14,946.00	\$16,047.00	\$0.00	\$16,768.00
Total Disbursement								\$51,074.00

For further clarifications, please direct your questions to Customer Service Bureau at 1-888-641-8722.

Sincerely,

USAC Disbursements Department

2000 L Street, N.W. Suite 200 Washington, DC 20036 Phone: (888) 641-8722 Fax: (888) 276-8736

<http://www.universalservice.org>



MAR 5 2004

Universal Service Administrative Company

High Cost Statement

2-27-04

Attn: Sandra Cooke
Washington RSA No. 8, LP
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000137

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of January, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529003	WA	\$3,382.00	\$0.00	\$0.00	\$14,946.00	\$16,015.00	\$0.00	\$16,768.00
Total		\$3,382.00	\$0.00	\$0.00	\$14,946.00	\$16,015.00	\$0.00	\$16,768.00
Total Disbursement								\$51,111.00

For further clarifications, please direct your questions to Customer Service Bureau at 1-888-641-8722.

Sincerely,

USAC Disbursements Department

2000 L Street, N.W. Suite 200 Washington, DC 20036 Phone: (888) 641-8722 Fax: (888) 276-8736

<http://www.universalservice.org>



FEB 3 2005

Statement Date: 1/25/2005 8

Invoice Number: NGHC0000000054

SPIN Number: 143000137

Balance Due USAC: \$70,508

Universal Service Administrative Company

Amount Enclosed:

Mail Payment To:

Washington RSA No. 8 Limited Partnership
P.O. Box 688,
Roslyn, WA 98941
Attn: Sandra Cooke

Universal Service Administrative Company
1259 Paysphere Circle
Chicago, IL 60674-1259

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

DISBURSEMENT ADJUSTMENT INVOICE

Date	Description	Charges	Credits
1/25/2005	Previous Balance	\$0.00	
	High Cost Support Mechanism Disbursement Adjustment	\$70,508	
	Recovery of LSS due to lack of annual certification.		
	BALANCE DUE USAC ON 2/25/2005		

*per James -
Related to 2004
5/6 reviewed with dispute
is cleared
2/7/05*

V	8	0000220	
INGH		0000000054	
In	12/31		
A	70,508		
	217		
	12/31		
	40060		
	510.05		

For questions regarding this invoice, contact the USF Billing, Collections, and Disbursement Contact Center at 888-641-8722.

Statement Date	Invoice Number	SPIN Number	Balance Due USAC
1/25/2005	NGHC0000000054	143000137	\$70,508

PAYMENT INFORMATION

Payment must be received by 2/25/2005 to avoid late payment penalties.

Please remit ACH payments in a CCD+ format to
ABA #071000505, Account #5590045653.

Please also include your Company Name, SPIN Number, and Invoice Number.

Exhibit 5

INLAND CELLULAR - EASTERN SUB-RSA LIMITED PARTNERSHIP
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
SUMMARY OF UNIVERSAL SERVICE DISBURSEMENTS - HIGH COST STATEMENTS
FOR THE YEAR ENDED DECEMBER 31, 2004

	TOTAL	INTERSTATE ACCESS	ICLS	HIGH COST LOOP	LONG TERM SUPPORT	LOCAL SWITCHING SUPPORT
<u>BOOKED AMOUNTS</u>						
<u>FIRST QUARTER</u>						
JAN	\$ 2,128		\$ 341		\$ 1,787	
FEB	\$ 2,128		\$ 341		\$ 1,787	
MAR	\$ 2,053		\$ 341	\$ (48)	\$ 1,760	
TOTAL FIRST QUARTER	\$ 6,309	\$ -	\$ 1,023	\$ (48)	\$ 5,334	\$ -
<u>SECOND QUARTER</u>						
APR	\$ 1,959		\$ 318		\$ 1,641	
MAY	\$ 1,960		\$ 318		\$ 1,642	
JUN	\$ 1,960		\$ 318		\$ 1,642	
TOTAL SECOND QUARTER	\$ 5,879	\$ -	\$ 954	\$ -	\$ 4,925	\$ -
<u>THIRD QUARTER</u>						
JUL	\$ 2,138		\$ 2,138			
AUG	\$ 2,138		\$ 2,138			
SEP	\$ 2,138		\$ 2,138			
TOTAL THIRD QUARTER	\$ 6,414	\$ -	\$ 6,414	\$ -	\$ -	\$ -
<u>FOURTH QUARTER</u>						
OCT	\$ 2,227		\$ 2,228	\$ (1)		
NOV	\$ 2,227		\$ 2,228	\$ (1)		
DEC	\$ 2,028		\$ 2,228	\$ (200)		
TOTAL FOURTH QUARTER	\$ 6,482	\$ -	\$ 6,684	\$ (202)	\$ -	\$ -
YEAR-END TOTAL	\$ 25,084	\$ -	\$ 15,075	\$ (250)	\$ 10,259	\$ -
SUPPPORT XIAS	\$ 25,084		\$ 15,075	\$ (250)	\$ 10,259	\$ -
PROJECTED TO RECEIVE	\$ 56,916		\$ 15,842	\$ 30,789	\$ 10,285	\$ -
DIFFERENCE	\$ 31,832		\$ 767	\$ 31,039	\$ 26	\$ -



FEB 7 2005

Universal Service Administrative Company

High Cost Statement

01-31-05

Attn: Sandra Cooke
Eastern Sub-RSA Limited Partnership
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000140

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of December, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529004	WA	\$0.00	(\$200.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	(\$200.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total Disbursement							\$2,028.00	

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



JAN 6 2005

Universal Service Administrative Company

High Cost Statement

12-30-04

Attn: Sandra Cooke
Eastern Sub-RSA Limited Partnership
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000140

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of November, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529004	WA	\$0.00	(\$1.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	(\$1.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total Disbursement								\$2,227.00

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department



Universal Service Administrative Company

High Cost Statement

11-30-04

Attn: Sandra Cooke

Eastern Sub-RSA Limited Partnership

P.O. Box 688

Roslyn, WA 98941

DEC 6 2004

RE: SPIN 143000140

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of October, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529004	WA	\$0.00	(\$1.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	(\$1.00)	\$0.00	\$2,228.00	\$0.00	\$0.00	\$0.00
Total Disbursement								\$2,227.00

For further clarifications, please direct your inquires to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department

NOV 1 2004



Universal Service Administrative Company

High Cost Statement
10-29-04

Attn: Sandra Cooke
Eastern Sub-RSA Limited Partnership
P.O. Box 688
Roslyn, WA 98941

RE: SPIN 143000140

Dear Sandra Cooke:

This is to inform you that the following disbursements have been remitted to the above mentioned account for the month of September, 2004.

SAC	State	IAS	HCL	SNA	ICLS	LTS	HCM	LSS
529004	WA	\$0.00	\$0.00	\$0.00	\$2,138.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	\$0.00	\$0.00	\$2,138.00	\$0.00	\$0.00	\$0.00
Total Disbursement								\$2,138.00

For further clarifications, please direct your inquiries to Customer Service Bureau at 888-641-8722.

Sincerely,

USAC Disbursements Department